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IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT OF
HINDS COUNTY, MISSISSIPPI

MARTIN H. MCCUBBINS

PLAINTIFF

V.

CAUSE NO. 16-98

UNITED AIRLINES, INC.;
UNITED CONTINENTAL HOLDINGS, INC.;
WILLIAM BLACK;
CHARLES WHITE;
and DEFENDANTS A-M

FILED

FEB 05 2016

ZACK WALLACE, CIRCUIT CLERK

BY

D.C.

DEFENDANTS

COMPLAINT

Plaintiff, Martin H. McCubbins, files this, his cause of action against the Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black, Charles White, and Defendants A-M, and alleges the following:

PARTIES

1. Plaintiff, Martin H. McCubbins, is an adult resident citizen of the First Judicial District of Hinds County, Mississippi, whose address is 71 Springridge Circle, Jackson, MS 39211.

2. Defendant, United Airlines, Inc., is a company organized and existing under the laws of the State of Delaware, with a principal place of business located at 233 S. Wacker Dr., HDQCT - 14th Floor, Chicago, Illinois, 60606. United Airlines is doing business in the State of Mississippi; and has designated CT Corporation Systems, as its registered agent for service of process. CT Corporation Systems may be served with process of the Court as its address of 645 Lakeland East Drive, Flowood, Mississippi 39232.

3. Defendant, United Continental Holdings, Inc., is a company organized and existing under and by virtue of the laws of a state other than the State of Mississippi, with a principal place of business located at 233 S. Wacker Dr., Chicago, Illinois, 60606. United Continental Holdings,



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Inc. is doing business in the State of Mississippi, by virtue of the fact that it has committed a tort, in whole or in part in the State of Mississippi. Further, United Continental Holdings, Inc., is engaged in business and contracts in the State of Mississippi, and therefore is doing business in the State of Mississippi. United Continental Holdings, Inc. may be served with process of this Court pursuant to the Mississippi Rules of Civil Procedure.

4. Defendant, William Black, is an adult resident of the State of Mississippi whose business address is United Airlines, Jackson-Evers International Airport, 100 International Dr., Suite 300, Jackson, MS 39208. Defendant, William Black, is named as a fictitious Defendant and is one of the individuals who reviewed Plaintiff's passport and negligently approved Plaintiff's flight to Panama and failed to warn Plaintiff that he would not be allowed into the Country of Panama because his passport was set to expire within six months from the dates of his flights on February 6, 2013, and February 13, 2013.

5. Defendant, Charles White, is an adult resident of the State of Mississippi whose business address is United Airlines, Jackson-Evers International Airport, 100 International Dr., Suite 300, Jackson, MS 39208. Defendant, Charles White, is named as a fictitious Defendant and is one of the individuals who reviewed Plaintiff's passport and negligently approved Plaintiff's flight to Panama and failed to warn Plaintiff that he would not be allowed into the Country of Panama because his passport was set to expire within six months from the dates of his flights on February 6, 2013, and February 13, 2013.

6. Defendants A-M and Defendants, William Black and Charles White, are corporations, individuals and entities who have their principal places of business or their residences in the State of Mississippi, and who are unidentified and unknown to the Plaintiff at the time. Plaintiff intends

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to file an Amended Complaint and name and serve Defendants A-M, once their identities are learned and their liabilities are ascertained by the Plaintiff.

COUNT I

7. Plaintiff adopts by reference and realleges each and every allegation of all paragraphs of all counts of the Complaint the same as though specifically set out herein again.

8. Defendants, United Airlines, Inc. and United Continental Holdings, Inc. (hereinafter collectively referred to as "United Airlines"), entered into a contract with Martin H. McCubbins in the First Judicial District of Hinds County, Mississippi and the contract was to be performed in whole or in part in the First Judicial District of Hinds County, Mississippi and the breaches and failure to warn occurred in whole or in part in the First Judicial District of Hinds County, Mississippi thereby making venue proper in the First Judicial District of Hinds County, Mississippi.

9. Martin H. McCubbins and his friend, Tommy Tann, prior to January 19, 2013, decided to visit Panama. In order to prepare for their trip, Tommy Tann searched the internet travel sites that offered airline tickets for sale to travel to Panama. Mr. McCubbins purchased his plane ticket to Panama at a cost of \$790.40 from the agent representing United Airlines and the ticket was received by him at his address which is located in the First Judicial District of Hinds County, Mississippi.

10. About 24 hours prior to the flight leaving, Mr. McCubbins went to the United Airlines website to check in and obtain his boarding pass. United Airlines indicated to Mr. McCubbins that since he was going out of the country he would have to come to the United Airlines ticket counter at the Jackson-Evers International Airport for William Black to inspect and verify McCubbins' passport and to verify that McCubbins' passport was valid for the dates of his flights. Mr.

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McCubbins, on the morning of the flight, went to the airport to board his flight to Panama. McCubbins, as he had been instructed, went to the United Airlines counter to check in. Mr. McCubbins obtained the United Airlines boarding pass from William Black after giving his passport to William Black for inspection. William Black, the ticket agent, examined Mr. McCubbins' passport; confirmed that McCubbins' passport was proper; assured McCubbins that everything was in order; and delivered Mr. McCubbins's boarding pass to him at the Jackson International Airport, Jackson, Mississippi. William Black, United Airlines' agent, reviewed McCubbins' passport and negligently failed to warn and advise McCubbins that he would not be allowed inside the country of Panama because his passport had an expiration date of six months or less from the date of his travel. The ticket and boarding pass that were received by Mr. McCubbins; and the warnings (if any), restrictions (if any), requirements (if any), and/or limitations (if any) alleged to be included by reference on the ticket and boarding pass were nonexistent or were phrased in such vague terms that the alleged warnings (if any), restrictions (if any), requirements (if any), and/or limitations (if any) to warn Mr. McCubbins that they inadequately warned or failed to warn him of the warnings, restrictions, requirements, and/or limitations of the ticket, boarding pass, and/or any other State, Federal, or International treaties. The alleged warnings, restrictions, requirements, and/or limitations were either not there or were so vague that any reliance thereon by the Defendants as a defense constitutes violations of State laws, Federal laws, the Constitution of the State of Mississippi; and the Constitution of the United States of America.

11. Mr. McCubbins proceeded to the United Airlines boarding area to prepare to board the United Airlines aircraft to Panama by way of Houston, Texas. Charles White, the boarding agent reviewed, inspected and verified McCubbins' boarding pass and passport and allowed McCubbins

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to board the aircraft although his passport was set to expire less than six months from his travel date. United Airlines' agent, Charles White, negligently failed to warn and advise McCubbins that he would not be allowed inside the country of Panama because his passport had an expiration date of six months or less from the date of his travel. Mr. McCubbins flew uneventfully from Jackson, Mississippi to Houston, Texas and on arrival in Houston McCubbins proceeded to the United Airlines gate where he boarded the aircraft that would take him to Panama. McCubbins again produced his passport and his boarding pass to the United Airlines representative and the United Airlines representative reviewed, inspected and verified the passport and cleared McCubbins to board the aircraft leaving for Panama, (about one and a half hours before the flight was scheduled to depart), despite the fact that his passport was set to expire less than six months from the travel date. About 30 minutes before the plane was scheduled to depart, the United Airlines representative made an announcement that all passengers would be required (for the second time) to show their passport to the United Airlines representative for United Airlines to verify that the passports were valid.

12. Martin H. McCubbins again showed his passport to the United Airlines representative and after his passport was validated was then allowed to board the United Airlines aircraft that was bound for Panama despite the fact that he had a passport that was set to expire less than six months from the travel date. McCubbins boarded the flight and had an uneventful flight from Houston, Texas to Panama.

13. Once McCubbins reached Panama he deplaned the aircraft and proceeded to customs. Once he arrived in customs, the Panama authorities reviewed McCubbins' passport and told him that he would not be allowed to enter the country of Panama because his passport was set to expire within

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six months of his flights. McCubbins was outraged and he was taken to the supervisor's office by customs. McCubbins was told he could not enter Panama because his passport was set to expire less than six months from the travel date. Mr. McCubbins explained to the Panamanian authorities that his passport had an expiration date of April 22, 2013; that the date of boarding was February 6, 2013; and that he would be leaving Panama on February 13, 2013. The supervisor said it did not matter because the passport was set to expire in less than six months from his dates of travel. McCubbins told the Panamanian supervisor that no one told him that he must have a passport that would not expire within six months from the date of travel. The supervisor told McCubbins that United Airlines was required to review his passport and required to double check the expiration date of the passport to make sure it did not expire within six months of the visit date. United Airlines representatives reviewed and approved McCubbins' passport and had at least four opportunities to inspect and review McCubbins' passport and advise him that he would not be allowed inside the country of Panama without a passport that did not expire within six months of the visit date. The supervisor told McCubbins that it was United Airlines' responsibility and that it should be fined.

14. McCubbins was then placed in an isolated room with armed guards outside, where he was unable to obtain any food whatsoever; did not have any place to sleep or rest; and was treated more like a common criminal than an international passenger. McCubbins was detained the entire evening and night without food; had to ask permission to use the restroom and, when permitted, was accompanied to the restroom by an armed police officer; was not provided a cot, mattress, pillow or place to sleep; and was forced to board the next United Airlines flight (which was the following day) back to Houston, Texas. McCubbins spent the night being mentally tortured as a direct result of the negligence of William Black, Charles White, United Airlines and other officers, directors,

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representatives, agents and employees of United Airlines. United Airlines, William Black and Charles White never provided McCubbins with instructions or information about the limitations with his passport nor advised McCubbins that his passport, (although it had not expired), was not sufficient to permit him to leave the airport terminal in Panama City, Panama because his passport expired within six months of the travel date.

15. The Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black, and Charles White, were negligent and grossly and recklessly negligent by failing to advise McCubbins of the limitations with his passport; by failing to warn McCubbins that he would not be allowed into the country of Panama; and by allowing McCubbins to board two different United Airlines flights; travel from Jackson, Mississippi to Houston, Texas; and travel from Houston, Texas to Panama City, Panama only to be held as a common criminal and held in a retaining room in Panama City, Panama by armed guards. The Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, were negligent and grossly and willfully negligent in their failures to advise McCubbins on at least four different occasions that his passport, (although it had not expired), was expiring within six months of his travel date and that he would not be allowed to enter any foreign country (including Panama) with a passport expiring within six months of the travel date. As a result of the gross and willful negligent acts of the Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, the Plaintiff sustained actual damages including but not limited to disgrace, humiliation, embarrassment, and false imprisonment. McCubbins was treated more like a prisoner than an international traveler. Plaintiff's damages as a result of the negligence and gross and willful acts of Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, which were the

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proximate contributing causes of Plaintiff's damages in the amount of \$50,000.00 and punitive damages in the sum of \$20,000.00 to deter the Defendants from such reckless and oppressive conduct in the future.

WHEREFORE PREMISES CONSIDERED, Plaintiff demands Judgment against the Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, jointly and severally, for his actual damages in the amount of Fifty Thousand Dollars (\$50,000.00.) The Plaintiff also seeks punitive damages in the amount of Twenty Thousand Dollars (\$20,000.00) to deter the Defendants from such reckless and oppressive conduct in the future; pre-judgment interest; post-judgment interest; and all costs.

COUNT II

16. Plaintiff, Martin H. McCubbins, adopts by reference and realleges each and every allegation of all paragraphs of this Complaint the same as though specifically set out herein.

17. On the occasion in question the Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, were negligent and grossly and willfully negligent by failing to disclose all terms and conditions of McCubbins' travel to Panama City, Panama; failing to abide by rules and regulations which were well known to United Airlines; failing to warn and advise McCubbins that he would not be allowed inside the country of Panama because his passport had an expiration date of six months or less from the date of his travel; failing to remedy the tragic situation; and failing to refund all expenses associated with McCubbins' trip to Panama. The negligence of the Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, as aforesaid was the sole proximate causes of the incident and the injuries and damages sustained by the Plaintiff and are in the amount of at least \$50,000.00. Defendants,

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United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, are responsible for McCubbins' damages and should be required to pay McCubbins the sum of \$50,000.00 for his actual damages, plus punitive damages in the sum of \$20,000.00 to deter the Defendants from such reckless and oppressive conduct in the future.

WHEREFORE PREMISES CONSIDERED, Plaintiff demands Judgment against the Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, jointly and severally, for his actual damages in the amount of Fifty Thousand Dollars (\$50,000.00.) The Plaintiff also seeks punitive damages in the amount of Twenty Thousand Dollars (\$20,000.00) to deter the Defendants from such reckless and oppressive conduct in the future; pre-judgment interest; post-judgment interest; and all costs.

COUNT III

18. Plaintiff, Martin H. McCubbins, adopts by reference and realleges each and every allegation of all paragraphs of this Complaint the same as though specifically set out herein.

19. Plaintiff entered into a contract with Defendants, United Airlines, Inc. and United Continental Holdings, Inc., for safe, reliable and informed travel to Panama City, Panama. The Defendants, United Airlines, Inc. and United Continental Holdings, Inc., breached their contract or agreement with the Plaintiff and as a result of their breaches of contract McCubbins suffered damages in the First Judicial District of Hinds County, Mississippi.

20. On the occasion in question, McCubbins paid all the sums requested of him to be paid by United Airlines and performed all of the obligations and duties in accordance with the contract or agreements. A copy of Plaintiff's travel itinerary and ticket is attached hereto as Exhibit "A" and

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incorporated herein by reference. A copy of Plaintiff's passport is attached hereto as Exhibit "B" and incorporated by reference.

21. As a result of Defendants', United Airlines, Inc. and United Continental Holdings, Inc., breaches of contract and agreements the Plaintiff has sustained damages in the amount of \$50,000.00; punitive damages in the sum of \$20,000.00 to deter the Defendants from such reckless and oppressive conduct in the future; pre-judgment interest; post-judgment interest; and all costs.

WHEREFORE PREMISES CONSIDERED, Plaintiff demands Judgment against the Defendants, United Airlines, Inc. and United Continental Holdings, Inc., for his actual damages in the amount of Fifty Thousand Dollars (\$50,000.00.) The Plaintiff also seeks punitive damages in the amount of Twenty Thousand Dollars (\$20,000.00) to deter the Defendants from such reckless and oppressive conduct in the future; pre-judgment interest; post-judgment interest; and all costs.

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WHEREFORE PREMISES CONSIDERED, Plaintiff demands Judgment against the Defendants, United Airlines, Inc., United Continental Holdings, Inc., William Black and Charles White, jointly and severally, for his actual damages in the amount of Fifty Thousand Dollars (\$50,000.00.) The Plaintiff also seeks punitive damages in the amount of Twenty Thousand Dollars (\$20,000.00) to deter the Defendants from such reckless and oppressive conduct in the future; pre-judgment interest; post-judgment interest; and all costs.

Respectfully submitted, this the 5th day of February, 2016.

PLAINTIFF

By: 

WAYNE E. FERRELL, JR.

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WAYNE E. FERRELL, JR.
Mississippi Bar No. 5182
Attorney at Law
Law Offices of Wayne E. Ferrell, Jr., PLLC
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Post Office Box 24448
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(601) 969-4700

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Marty McCubbins

From: tom@bigbuckrattlingantlers.com [tmtannjr@yahoo.com]
 Sent: Saturday, January 19, 2013 12:11 PM
 To: Marty McCubbins
 Subject: PANAMA TRIP

----- Forwarded Message -----

From: "United Airlines, Inc." <unitedairlines@united.com>
 To: TMTANNJR@YAHOO.COM
 Sent: Saturday, January 19, 2013 11:08 AM
 Subject: eTicket Itinerary and Receipt for Confirmation A7NGR6

UNITED

A STAR ALLIANCE MEMBER

Confirmation:

A7NGR6

[Check-In >](#)

Issue Date: January 19, 2013

Traveler	eTicket Number	Frequent Flyer	Seats
MCCUBBINS/MARTINHARTLEYMR	0162352801421		---/---/---/---

FLIGHT INFORMATION

Day, Date	Flight	Class	Departure City and Time	Arrival City and Time	Aircraft	Meal
Wed, 06FEB13	UA4650	U	JACKSON, MS (JAN) 6:40 AM	HOUSTON, TX (IAH -BUSH INTL) 8:03 AM	ERJ-145	
Flight operated by EXPRESSJET AIRLINES INC doing business as UNITED EXPRESS.						
Wed, 06FEB13	UA1034	U	HOUSTON, TX (IAH -BUSH INTL) 2:08 PM	PANAMA CITY, PANAMA (PTY) 7:15 PM	737-900	Snack
Sat, 16FEB13	UA1031	S	PANAMA CITY, PANAMA (PTY) 9:55 AM	HOUSTON, TX (IAH -BUSH INTL) 1:15 PM	757-300	Snack
Sat, 16FEB13	UA4239	S	HOUSTON, TX (IAH -BUSH INTL) 5:03 PM	JACKSON, MS (JAN) 6:20 PM	ERJ-145	
Flight operated by EXPRESSJET AIRLINES INC doing business as UNITED EXPRESS.						

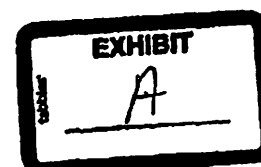
FARE INFORMATION**Fare Breakdown**

Airfare:	678.00USD
U.S. Federal Transportation Tax:	34.40
September 11th Security Fee:	7.50
U.S. Customs User Fee:	5.50
U.S. Immigration User Fee:	7.00
U.S. APHIS User Fee:	5.00
Panama Airport Security Fee:	2.50
Panama Departure Tax:	40.00
U.S. Passenger Facility Charge:	10.50
Per Person Total:	790.40USD
eTicket Total:	790.40USD

Form of Payment:

VISA
 Last Four Digits 8228

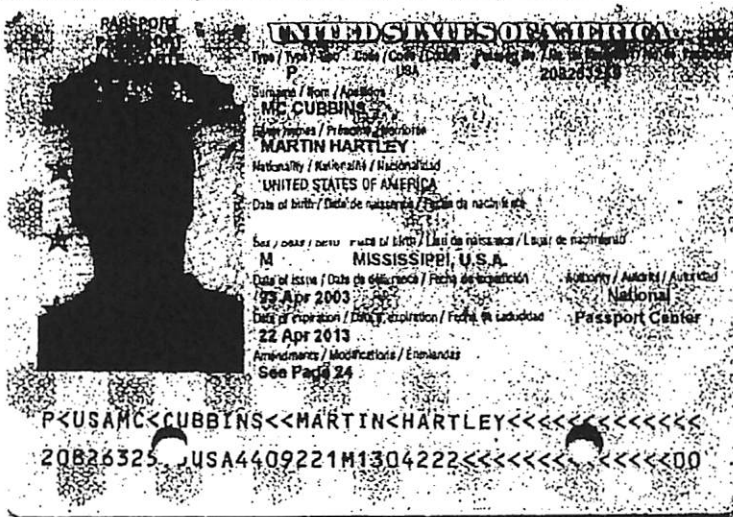
The airfare you paid on this itinerary totals: 678.00 USD



El Secretario de Estado de los Estados Unidos de América por el presente solicita a las autoridades competentes permitir el paso del ciudadano o nacional de los Estados Unidos aquí nombrado, sin demora ni dificultades, y en caso de necesidad, prestatle toda la ayuda y protección lícitas.

SIGNATURE OF HEARER/SIGNATURE DU TITULAIRE/FIRMA DEL TITULARE

NOT VALID UNTIL SIGNED



EXHIBIT

F

COVER SHEET Civil Case Filing Form (To be completed by Attorney/Party Prior to Filing of Pleading)		Court Identification Docket # <u>1-1</u> Filed <u>02/05/2016</u> Page # <u>1</u> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> </div> <div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> </div> <div style="border: 1px solid black; padding: 2px;"> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 2px;"></div> </div> </div>	
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2009)	
In the <u>CIRCUIT</u> Court of <u>HINDS</u> County - <u>1ST</u> Judicial District		Case Number <u>16-00098</u>	
Origin of Suit (Place an "X" in one box only) <input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal			
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form Individual <u>MCCUBBINS</u> Last Name <u>MARTY</u> First Name _____ Maiden Name, if applicable _____ M.I. _____ Jr/Sr/III/IV _____ Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____ Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated _____ Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____ D/B/A _____ Address of Plaintiff <u>405 TOMBIGBEE ST., JACKSON, MS 39201</u> Attorney (Name & Address) <u>WAYNE E. FERRELL, JR., 405 TOMBIGBEE ST., JACKSON, MS 39201</u> MS Bar No. <u>5182</u> Check (x) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing: _____			
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form Individual _____ Last Name _____ First Name _____ Maiden Name, if applicable _____ M.I. _____ Jr/Sr/III/IV _____ Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____ Business <u>UNITED AIRLINES, INC.</u> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated _____ Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: _____ D/B/A _____ Attorney (Name & Address) - If Known _____ MS Bar No. _____			
Damages Sought: Compensatory \$ <u>50,000</u> Punitive \$ <u>20,000</u> Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet			
Nature of Suit (Place an "X" in one box only)			
Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____ Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other _____	Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____ Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____	Children/Minors - Non-Domestic <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____ Civil Rights <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____ Contract <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____ Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____ Torts <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Other <u>VIOLATION</u>

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IN THE _____ COURT OF _____ COUNTY, MISSISSIPPI

JUDICIAL DISTRICT, CITY OF _____

Docket No.

File Yr

Chronological No.

Clerk's Local ID

Docket No. If Filed

Prior to 1/1/94

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of ____ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant #2:

Individual: _____ (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business UNITED CONTINENTAL HOLDINGS, INC.

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #3:

Individual: BLACK WILLIAM (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #4:

Individual: WHITE CHARLES (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____